COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION CASE NO. 2013-00052

NOV 1 2013
PUBLIC SERVICE

COMMISSION

In the Matter of:

ROY G. COLLINS,

COMPLAINANT

V.

JACKSON PURCHASE ENERGY CORPORATION, DEFENDANT

PLAINTIFF'S INITIAL REQUESTS FOR INFORMATION TO JACKSON PURCHASE ENERGY CORPORATION

Comes Roy G. Collins, for his initial request for information to Jackson Purchase Energy Corporation, and states as follows:

- 1. What was JPEC's classification of the mobile home formerly located on Hill Grove Road?
- 2. State the reasons supporting the classification of the mobile home formally located on Hill Grove Road.
- 3. Has JPEC billed the Hill Grove Road address as residential since the mobile home has been removed from the property? If so, why?
- 4. Did JPEC classify the mobile home formerly located on Hill Grove Road either as a permanent residence or primary residence?
- 5. Did JPEC ever classify the mobile home formerly located on Hill Grove Road as commercial?
- 6. Please state the section of the tariff applicable to the Carrisville Road property that requires it to be the primary residence of the customer before Jackson Purchase Energy Corporation is responsible for the installation costs of the first 1000 feet of line.

7. Identify the section of the tariffs that apply to either the Hill Grove Road property or the Carrsville Road property that define "permanent residence" or "primary residence".

ROY G. COLLINS

MORGAN, BRASHEAR, COLLINS & YEAST

ATTORNEYS AT LAW

109 DICKENSON STREET

MANCHESTER, KENTUCKY 40962

(606) 598-2122

FAX # 606-598-7842

EMAIL: roy.collins@mmbcylaw.com

CERTIFICATE

This is to certify that I have served a true and correct copy of the foregoing by mailing the same to the following:

Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

Melissa D. Yates Denton & Keuler P.O. Box 929 Paducah, KY 42002-0929

This 30 day of Oct., 2013.

ROY **G**. COLLINS